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*Additional Plaintiff's Counsel Appear  
on the Signature Page*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

ROBERT CULLEN, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

ZOOM VIDEO COMMUNICATIONS, INC.  
a Delaware corporation,

Defendant.

Case No.: 5:20-cv-02155-LHK

**PLAINTIFF KIRPEKAR'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES SHOULD  
BE RELATED**

AJAY KIRPEKAR, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

ZOOM VIDEO COMMUNICATIONS, INC.  
a Delaware corporation,

Defendant

Case No.: 5:20-cv-03042-NC

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that, pursuant to Civil Local Rules 3-12 and 7-11, Plaintiff in *Kirpekar v. Zoom Video Communications, Inc.*, No. 5:20-cv-03042-NC (“*Kirpekar*”), submits this Administrative Motion for the Court to consider whether *Kirpekar* should be related to *Cullen v. Zoom Video Communications, Inc.*, No. 5:20-cv-02155-LHK (“*Cullen*”). Plaintiff further requests reassignment to the Honorable Lucy H. Koh, United States District Judge, for all further proceedings in *Kirpekar*.

Under Local Rule 3-12(a), “An action is related to another when: (1) The actions concern substantially the same parties, property, transaction or event; and (2) It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges.” Both elements are satisfied to relate *Kirpekar* and *Cullen*.

The *Kirpekar* and *Cullen* actions are related because they concern substantially the same parties, property, transactions, and events. Both are proposed class actions against Zoom Video Communications, Inc. (“Zoom”) concerning allegations that Zoom violated various consumer

1 protection laws related to Zoom’s security and privacy practices, as well as alleged  
2 vulnerabilities in Zoom’s products. *Cullen* was filed on March 30, 2020. Since then, at least ten  
3 other similar proposed class actions against Zoom have been filed in this District.

4  
5 On April 24, 2020, pursuant to stipulation of the parties in *Taylor v. Zoom Video*  
6 *Telecommunications, Inc.*, No. 3:20-cv-02170-RS (“*Taylor*”), *Johnston v. Zoom Video*  
7 *Telecommunications, Inc.*, No. 5:20-cv-02376-SVK (“*Johnston*”), *Kondrat, et al v. Zoom Video*  
8 *Telecommunications, Inc.*, No. 5:20-cv-02520-NC (“*Kondrat*”), *Lawton v. Zoom Video*  
9 *Telecommunications, Inc.*, No. 3:20-cv-02592-SK (“*Lawton*”), *Jimenez v. Zoom Video*  
10 *Telecommunications, Inc.*, No. 5:20-cv-02591-LHK (“*Jimenez*”), *Hartmann v. Zoom Video*  
11 *Telecommunications, Inc.*, No. 5:20-cv-02620-NC (“*Hartmann*”), and *Henry v. Zoom Video*  
12 *Telecommunications, Inc.*, No. 5:20-cv-02691-SVK (“*Henry*”) (collectively, the “Stipulated  
13 Cases”), this Court ordered all cases related to *Cullen*, and reassigned them to this Court for all  
14 purposes. (Doc. No. 28). Since then, three additional cases (not including Plaintiffs’ case) have  
15 similarly moved for relatedness under the Local Rules: *Simins v. Zoom Video*  
16 *Telecommunications, Inc.*, No. 5:20-cv-02893-VKD (“*Simins*”) (Doc. No. 35), *Greenbaum v.*  
17 *Zoom Video Telecommunications, Inc.*, No. 5:20-cv-02861-NC (“*Greenbaum*”) (Doc. No. 36)  
18 and *Buxbaum, et al., v. Zoom Video Telecommunications, Inc.*, No. 5:20-cv-02939-SVK (“*Buxbaum*”)  
19 (Doc. No. 40). On May 7, 2020, this Court ordered that *Simins* and *Buxbaum* are related to  
20 *Cullen*, and reassigned them to this Court for all purposes. (Doc. Nos. 43 and 44).

21  
22 Given the common parties, allegations, and requested relief, adjudication of these actions  
23 separately would create an unduly burdensome duplication of labor and expense. Assignment of  
24 these cases to a single United States District Judge will conserve judicial resources and eliminate  
25 the potential for conflicting results. The actions are at a preliminary stage and thus assignment to  
26  
27  
28

a single judge would not prejudice any of the parties.

For the reasons set forth above, Plaintiff respectfully requests that the Court relate the *Kirpekar* action to the *Cullen* action, and that this Court reassign the *Kirpekar* action to this Court.

Dated: May 8, 2020

s/Garrett D. Blanchfield  
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